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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

JAMES W. LESCINSKY
Plaintiff,

CASE NO:
2 :18-CV-01479-JAD-CWH

vs.

CLARK COUNTY SCHOOL DISTRICT, A political subdivision of the State of Nevada, PAT SKORKOWSKY, individually and in his official capacity as Superintendent of Clark County School District, TAMMY MALICH, individually and in her capacity as Assistant Superintendent of Clark County School District, MIKE BARTON, individually and in his official capacity as Chief Academic Officer of Clark County School District, CLARK COUNTY SCHOOL DISTRICT POLICE DEPARTMENT, A political subdivision of the State of Nevada, JAMES KETSAA, individually and in his capacity as Chief of Police for Clark County School District Police Department, CHRISTOPHER KLEMP, individually and in his role as a Internal Affairs Detective for Clark County School District Police Department, KENNETH YOUNG, individually and in his official capacity as a Police Captain for the Clark County School District Police Department, ROE and DOE SUPERVISORS, not yet known,
Defendants.

STIPULATION AND ORDER TO
EXTEND TIME TO FILE PLAINTIFF'S
OPPOSITION TO DEFENDANT
CHRISTOPHER KLEMP'S SPECIAL
MOTION TO DISMISS PURSUANT TO
NRS 41.660 (NEVADA'S ANT-SLAPP
STATUTE)

ECF No. 28

COMES NOW Plaintiff, JAMES LESCINSKY, by and through his attorney of record MELVIN R. GRIMES, ESQ. of THE GRIMES LAW OFFICE, and Defendant, CHRISTOPHER KLEMP, by and through his Attorneys of Record, MARK E. FERRARIO, ESQ., KARA HENDRICKS ESQ., and BETHANY L. RABE ESQ. of GREENBERG TRAURIG, and hereby

1 stipulate and make joint application to extend the time for Plaintiff to file an Opposition to
2 Defendant's Motion to Dismiss.

- 3 1. On November 9th 2018, the Defendant, Christopher Klemp, by and through his attorneys of
4 record, Mark E. Ferrario, Esq., Kara Hendricks Esq., And Bethany L. Rabe Esq. filed a Special
5 Motion to Dismiss Pursuant to NRS 41.660.
- 6 2. The current due date for Plaintiff's Opposition to Defendant Christopher Klemp's Special
7 Motion to Dismiss Pursuant to NRS 41.660 is November 28th 2018.
- 8 3. Due to a sudden death in the family, Counsel will be away from the jurisdiction until after the
9 Thanksgiving holiday. As such, Counsel will be unable to prepare and file Plaintiff's
10 Opposition before the current due date
- 11 4. On November 15th 2018, Attorney Hendricks agreed to extend the due date for Plaintiff's
12 Opposition to Plaintiff's Motion to Dismiss to December 3rd 2018.

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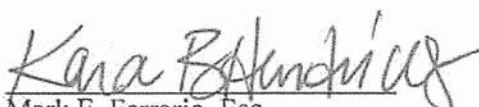
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1 5. This is the second request for enlargement of time and it is made in good faith and not for
2 purposes of delay.

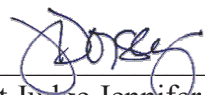
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4 **THE GRIMES LAW OFFICE**

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12 **GREENBERG TRAUIG**

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16 Kara Hendricks, Esq.
17 Nevada Bar No.: 7743
18 Bethany Rabe, Esq.
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23 *Attorneys for Christopher Klemp*

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IT IS SO ORDERED.


U.S. District Judge Jennifer A. Dorsey
Dated: November 21, 2018